

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA

State of Oklahoma, et al.,)	
)	
)	05-CV-0329 GKF-SAJ
Plaintiffs,)	
)	
v.)	SUPPLEMENTAL AFFIDAVIT OF
)	DARA D. MANN
Tyson Foods, Inc., et al.,)	
)	
Defendants.)	
)	

[illegible]

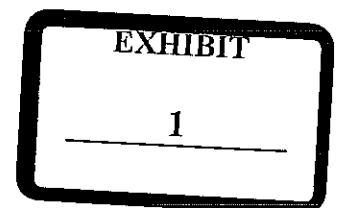
I, Dara D. Mann, hereby depose and state as follows:

1. I am an attorney at Faegre and Benson, LLP. I represent Cargill, Inc. and Cargill Turkey Production, LLC (“the Cargill Defendants”) in the above-captioned litigation. I make this affidavit on personal knowledge and submit it in support of the Cargill Defendants’ Motion for Clarification.

2. I have supervised the Cargill Defendants' efforts to collect, review and produce documents responsive to the Court's July 6 Order.

3. In the months since the issuance of the Court's July 6 Order, the Cargill Defendants have collected approximately 223 boxes, or 669,000 pages, in six states that may contain corporate knowledge information from their domestic turkey production facilities.

4. The Cargill Defendants have spent over 600 person-hours identifying locations of potentially responsive documents, interviewing records custodians, and physically retrieving these documents alone.



5. The Cargill Defendants have spent many more person-hours conducting an ongoing detailed review of the documents collected for actual responsiveness, confidentiality, and privilege, and they expect to begin producing responsive documents on a rolling basis by the first week of November.

THIS CONCLUDES MY AFFIDAVIT.

s/ Dara D. Mann

Dara D. Mann

Subscribed and sworn to before me
this __th day of October, 2007.

s/

Notary Public

My commission expires: